

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**BOARD OF TRUSTEES SHEET METAL
WORKERS' NATIONAL PENSION FUND,
*et al.***

Plaintiffs,

v.

NEW YORK CHUTES, LLC,

Defendant.

Case No. 1:22-cv-1294-PTG-WEF

SUPPLEMENTAL DECLARATION OF ROBERT GEISLER

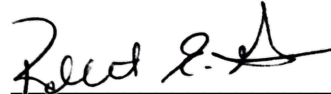
1. I am the Collections Manager for the Sheet Metal Workers' National Pension Fund ("NPF"). I make this supplemental declaration in support of Plaintiffs' request for delinquent contributions, accrued interest, liquidated damages, audit fees, and attorneys' fees and costs owed pursuant to the audit conducted by the Funds.

2. I incorporate my declarations dated March 30, 2023 and July 19, 2023 by reference.

3. As a result of the audit for the period of July 2016 through December 2020, NY Chutes owes \$12,577.76 in contributions, \$5,668.73 in interest (calculated through November 13, 2023), and \$5,668.73 in liquidated damages. Because amounts were found due and owing, Defendant is also responsible for the payment of \$2,955.50 in audit testing fees pursuant to Section 1 of the Collections Policy. In total, Defendant owes \$26,870.72 to the Funds pursuant to the audit.

I have read this declaration in its entirety. Pursuant to 28 U.S.C. §1746, I certify under penalty of perjury that the foregoing is true and correct.

Executed on November 15, 2023.



Robert Geisler